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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA GOODMAN
IN SUPPORT DEFENDANT OTTO
TRUCKING'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF DEFENDANTS' MOTION
IN LIMINE NO. 26 (DKT. 1540)**

Judge: Hon. William H. Alsup
Trial Date: October 10, 2017

I, Martha L. Goodman, declare as follows:

1. I am an associate at the law firm Boies Schiller Flexner LLP representing Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in good standing of the Bar of the District of Columbia. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Its Motion in Limine No. 26 (Dkt. 1540). I make this declaration based on personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein.

2. I have reviewed the following documents and confirm that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 5 to the Chatterjee Declaration ISO Defendants’ Motion in Limine No. 26	Red outlined boxes
Exhibit 6 to the Chatterjee Declaration ISO Defendants’ Motion in Limine No. 26	Red outlined boxes

3. The red outlined boxed portions of Exhibits 5 and 6 contain Uber employee names and confidential email addresses of current and former Uber employees, the disclosure of which would threaten the privacy of individuals at a company that is currently the subject of extensive media coverage.

4. Defendants’ request to seal is narrowly tailored to those portions of Exhibits 5 and 6 that merit sealing.

5. Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the highlighted versions documents at issue, with accompanying chamber copies..

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 18th day of September, 2017, in Washington, DC.

/s/ Martha L. Goodman

Martha L. Goodman

ATTESTATION OF E-FILED SIGNATURE

I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Martha L. Goodman has concurred in this filing.

/s/ Karen L. Dunn

Karen L. Dunn